BEFORE THE TENNESSEE REGULATORY AUTHORITY

Nashville, Tennessee LATORY AUTH.

IN RE: GENERIC DOCKET TO CONSIDER TECHNOLOGY ADVANCES

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CONSOLIDATED CLEC COMMENTS

The Association of Communications Enterprises; AT&T Communications of the South Central States, LLC and TCG Midsouth, Inc.; Cinergy Communications Company; DIECA Communications, Inc. d/b/a Covad Communications Company; ITC^DeltaCom Communications, Inc.; MCI WorldCom Communications, Inc., MCImetro Access Transmission Services, LLC, Brooks Fiber Communications of Tennessee, Inc; Network Telephone Corporation; and NewSouth Communications Corp., Birch Telecom, Inc. (collectively, the "Intervenors") hereby file the following comments concerning the unbundled network element ("UNE") rates requiring reevaluation due to advances in technology.

BACKGROUND

This proceeding has its origins in docket 97-01262 (the "Permanent Prices" docket) in which the Tennessee Regulatory Authority ("TRA") set cost-based rates for unbundled network elements using an adjusted cost model developed by BellSouth Telecommunications, Inc. ("BellSouth"). In that proceeding, the Authority held that BellSouth's study should reflect "the least cost and most efficient technology" available.

798497 v1 010269-038 5/24/2002 Second Interim Order, at 10. The Authority also noted that BellSouth had developed a new cost model, the "BellSouth Telecommunications Loop Model" ("BSTLM") which had been filed in other states but not in Tennessee. According to BellSouth, the newer model reflected more up-to-date, and presumably more efficient, technologies. *Id.*, at 10-11. The Authority also recognized, however, that "the process of incorporating technology advances may be cumbersome" and could delay a final determination of UNE rates. Final Order, at 11. Therefore, rather than ordering BellSouth to file the new BSTLM study in Tennessee, the Authority decided to convene a "new generic docket" at a later time to evaluate the impact of new technologies on UNE rates. *Id.*

In other words, the first step of this proceeding should be to require BellSouth to file in Tennessee its BSTLM study as well as any cost studies BellSouth has recently filed in other state proceedings. BellSouth should be required to adjust those studies to be consistent with the adjustments ordered in Docket 97-01262. Since "over time, telecommunications network expenses should decrease" (*id.*, at 10), the new, adjusted studies should produce lower rates for all UNEs. For that reason, attached to this filing is a list which, the Intervenors believe, includes all current UNEs. However, as the TRA orders new UNEs or new combinations of UNEs, ¹ the Intervenors will ask the Authority to incorporate those into this docket.

TECHNOLOGICAL ADVANCES

¹ In docket 00-00544, for example, the Authority recently ordered BellSouth to install dual purpose line cards in BellSouth's remote terminals for use by competing carriers. Therefore, in this docket BellSouth should be directed to file a cost-based rate for the use of that element as well as a rate for a combination of that element with a loop, port, and transport.

Since the time of the prior UNE cost case, the facilities used to provision UNEs have changed, the methods used to determine the costs of providing UNEs have been refined, the forward-looking network and processes have changed, and the industry has improved the process of determining forward-looking costs. All of these changes are a result of advances in technology whether direct (*i.e.* changes in the technology used to provision UNEs) or indirect (*i.e.* improved ability to model a forward-looking network) and, taken together, these changes indicate that the time has come to reconsider in their entirety the recurring and nonrecurring rates for UNE loops and switching for BellSouth in Tennessee.

I. Technology-Driven Changes in the Cost of Network Facilities

A number of significant changes have occurred in the cost of network facilities. For example, transport costs have declined dramatically. The deployment of fiber optic facilities and ATM switching has led this decline. BellSouth's network today already includes ATM switching which was not considered in the development of the current UNE rates in Tennessee.

Another example is the increased deployment of Digital Loop Carrier ("DLC") facilities. DLC is used to consolidate traffic in the loop portion of the network in order to better utilize existing structures (*i.e.* poles, conduit and trenching), and to improve economies of scale. Furthermore, the cost of DLC equipment has declined steeply in the last seven years. Keeping pace with this rapid cost decline, the capabilities of DLC facilities have increased dramatically over the same period.

The impact of these changes can be seen, for example, in the deployment of Next Generation Digital Loop Carrier technology. Through the use of "dual purpose" line cards, NGDLC equipment can now provide ADSL and POTS service over the same facility. This eliminates the need for the separate copper "home run" loops for ADSL and permits the DSL network and the POTS network to be merged. Quite clearly, there are significant economies of scale and scope in provisioning, maintaining and engineering this combined Broadband/POTS network. Given that (1) the absolute cost of the equipment has declined, (2) the per-unit cost to provision, maintain and engineer the network has declined, and (3) the capabilities of the network have increased, it would appear that over the last several years there has been a spectacular reduction in the per-unit, forward looking cost of a loop. Accordingly, the time has come for Tennessee to fully re-evaluate the UNE rates that CLECs—and, ultimately, Tennessee customers—must pay.

II. Technology-Driven Changes in the Cost of Switching

Over the last seven years, there has also been a significant decline in the overall per unit cost of switching. ILECs are augmenting their circuit switched networks with packet switched networks in order to reduce switching costs and further the engineering goal of provisioning broadband and narrowband services over common facilities. As technology continues to evolve, switching costs continue to decline. Accordingly, the Authority should also re-evaluate switching rates so that Tennessee customers may have the opportunity to gain the cost benefits that should be accruing to them based on a switching technology that is not some pipe-dream, but, in fact, is already being deployed in Tennessee.

III. Technology-Driven Changes in the Network Modeling

Finally, in cost cases across the region and the country, there has been a meeting of the minds on the appropriate tools that should be used to calculate forward-looking UNE loop costs. The fact that some agreement has developed as to the appropriate modeling techniques to use for BellSouth's network is quite clear when the recent history of cost models in the BellSouth region is examined.

In the previous Tennessee UNE case, WorldCom and AT&T presented a scorched node UNE loop model called the HAI model whereas BellSouth presented a statistical sample method to develop UNE loop rates through its TELRIC calculator cost model. By contrast, in recent UNE cost proceedings in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi and South Carolina, BellSouth has now adopted its own version of a scorched node cost model to develop its proposed UNE loop rates. BellSouth calls this scorched node cost model the "BSTLM."

BellSouth's BSTLM includes several advances over earlier cost models. For instance, the BSTLM provides a state regulator with the ability to "cost" the forecasted demand of all types of loops at the same time, thereby providing the ability to fully model economies of scale and scope. Further, by using road data, BSTLM more accurately distributes that demand to the "geo-coded" locations where end users are located.² Taking these advances into consideration, it becomes clear that when BellSouth's BSTLM is used with appropriate, forward-looking inputs, it creates the potential to more

² Geo-coding is a method used in cost modeling to assign numerical longitude and latitude coordinates to customer locations.

accurately determine on a geographically de-averaged level, the forward-looking cost of loops. Thus, not only has technology driven down loop and switching costs to an extent that is not accounted for in Tennessee's current recurring and nonrecurring rates, but the years since the last cost case have also increased the ability of the parties to model the loop accurately. In considering the impact of all these technology advances, the time has arrived for Tennessee to reconsider all of its recurring and nonrecurring rates.

CONCLUSION

The technological advances in loop, switching, and cost modeling that have occurred since the 1997 cost case in Tennessee require that the recurring and nonrecurring rates for all UNEs listed in Attachment 1 for BellSouth in Tennessee be reevaluated, and we respectfully submit that it would be appropriate for the Authority to order such a reevaluation in this docket.

Respectfully submitted,

Henry Walker

Boult, Cummings, Conners & Berry, PLC

414 Union Street, Suite 1600

Nashville, Tennessee 37219

(615) 252-2306

Counsel for the Intervenors

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via fax or hand delivery and U.S. mail to the following on this the 24th day of May, 2002.

Guy Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce St., Suite 2101
Nashville, TN 37201-3300

Henry Walker

ATTACHMENT

Δ. 0	UNBUNDLED LOCAL LOOP
A. 1	2-WIRE ANALOG VOICE GRADE LOOP
A.1.1	2-Wire Analog Voice Grade Loop - Service Level 1
A.1.1	2-Wire Analog Voice Grade Loop - Service Level 1 - Disconnect Only
A.1.2	ı
A.1.2	2-Wire Analog Voice Grade Loop - Service Level 2 - Disconnect Only
A. 2	
A.2.1	Sub-Loop Feeder Per 2-Wire Analog Voice Grade Loop
A.2.1	- Disconnect Only
A.2.2	
A.2.2	- Disconnect Only
A.2.11	
A.2.11	g Voice Grade Loop - Disconnect Only
A.2.13	
A.2.14	2-Wire Intrabuilding Network Cable (INC)
A.2.14	2-Wire Intrabuilding Network Cable (INC) - Disconnect Only
	4-Wire Intrabuilding Network Cable (INC)
	4-Wire Intrabuilding Network Cable (INC) - Disconnect Only
	Sub-Loop - Per Cross Box Location - CLEC Feeder Facility Set-Up
	Sub-Loop - Per Cross Box Location - Per 25 Pair Panel Set-Up
	Sub-Loop - Per Building Equipment Room - CLEC Feeder Facility Set-Up
	- Per Building Equipment Room - Per 25 Pair Panel Set-Up
	- Per Cross Box Location - CLEC Distribution Facility Set-Up
	- Per 4-Wire Analog Voice Grade Loop / Feeder Only
	Sub-Loop - Per 4-Wire Analog Voice Grade Loop / Feeder Only - Disconnect Only
	- Disconnect Only
	- Per 4-Wire 56 or 64 Kbps Digital Grade Loop / Feeder Only
5.6	SUD-HOOD - Per 4-Wire 56 or 64 Kbps Digital Grade Loop / Feeder Only - Disconnect Only

THAN LINE LOOP	
Loop - Disconnect Only	A 5 2-Wire An
	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
	.4.1 4-Wire An
	A.4 4-WIRE AN
Unbundled Loop Concentration - Digital 19, 56, 64 Kbps Data - Disconnect Only	4.3.22 Unbundled
Loop Concentration - Digital 19, 56, 64 Kbps Data	Unbundled
Loop Concentration - TEST CIRCUIT Card - Disconnect Only	
Loop Concentration - TEST CIRCUIT Card	1.3.21 Unbundled
Unbundled Loop Concentration - Specials Card - Disconnect Only	
Loop Concentration - Specials Card	1.3.20 Unbundled
d Loop Concentration - SPOTS Card - Disconnect Only	1.3.19 Unbundled Loop
Concentration - SPOTS Card	4.3.19 Unbundled Loop
Unbundled Loop Concentration - ISDN (Brite Card) - Disconnect Only	4.3.18 Unbundle
Loop Concentration - ISDN (Brite Card)	A.3.18 Unbundled
Concentration - POTS Card - Disconnect Only	A.3.17 Unbundled Loop
Concentration - POTS Card	
- DS1 Line Interface Card - Disconnect Only	
Loop Concentration - DS1 Line Interface Card	A.3.16 Unbundled
Concentration - System B (TR303)	A.3.15 Unbundled Loop
Concentration - System A (TR303)	A.3.14 Unbundled Loop
Unbundled Loop Concentration - System B (TR008)	A.3.13 Unbundle
Loop Concentration - System A (TR008)	A.3.12 Unbundled
LOOP CHANNELIZATION AND CO INTERFACE (INSIDE CO)	А.3 ГООР СНА
Network Interface Device (NID) - 6 line	A.2.45 Network
,	A.2.44 Network
- Per 4-Wire Copper Loop Short / Distribution Only - Disconnect Only	A.2.42 Sub-Loop
- Per 4-Wire Copper Loop Short / Distribution Only	A.2.42 Sub-Loop
- Per 2-Wire Copper Loop Short / Distribution Only - Disconnect Only	A.2.40 Sub-Loop
- Per 2-Wire Copper Loop Short / Distribution Only	A.2.40 Sub-Loop
- Per 4-Wire Copper Loop Short / Feeder Only - Disconnect Only	A.2.32 Sub-Loop
- Per 4-Wire Copper Loop Short / Feeder Only	A.2.32 Sub-Loop
Per 2-Wire Copper Loop Short / Feeder Only - Disconnect Only	A.2.30 Sub-Loop -
- Per 2-Wire Copper Loop Short / Feeder Only	A.2.30 Sub-Loop

Unbundled Loop Concentration - System A (TR008) - Disconnect Only	4.12.1
Concentration - System A (TR008)	
(OUTSIDE CENTRAL OFFICE)	-1
RATION DEB CASCULATION CONTRACT OF ACTUAL AC	A.12
- Disconnect Only	A.10.1
4-Wire 19, 56 or 64 Kbps Digital Grade Loop	A.10.1
4-WIRE 19, 56 OR 64 KBPS DIGITAL GRADE LOOP	
Sub-Loop Feeder Per 4-Wire DS1 Digital Loop - Disconnect Only	2
Sub-Loop Feeder Per 4-Wire DS1 Digital Loop	
4-Wire DS1 Digital Loop - Disconnect Only	
4-Wire DS1 Digital Loop	A.9.1
4-WIRE DS1 DIGITAL LOOP	A. 9
Loop (Nonrecurring without LMU) - Disc. Only	A.8.1woL
4-Wire HDSL Compatible Loop (Nonrecurring without LMU)	A.8.1woL
4-Wire HDSL Compatible Loop (Nonrecurring with LMU) - Disc. Only	A.8.1wL
4-Wire HDSL Compatible Loop (Nonrecurring with LMU)	A.8.1wL
4-Wire HDSL Compatible Loop	A. 8.1
4-WIRE HIGH BIT RATE DIGITAL SUBSCRIBER LINE (HDSL) COMPATIBLE LOOP	A. 8
2-Wire HDSL Compatible Loop (Nonrecurring without LMU) - Disc. Only	A.7.1woL
2-Wire HDSL Compatible Loop (Nonrecurring without LMU)	A.7.1woL
2-Wire HDSL Compatible Loop (Nonrecurring with LMU) - Disc. Only	A.7,1wL
2-Wire HDSL Compatible Loop (Nonrecurring with LMU)	A.7.1wL
2-Wire HDSL Compatible Loop	A.7.1
	A. 7
LMU) - Disc. Only	A.6.1woL
without LMU)	A.6.1woL
- Disc. Only	A.6.1wL
2-Wire ADSL Digital Subscriber Line Compatible Loop (Non-recurring with LMU)	A.6.1wLMU
2-Wire ADSL Compatible Loop (Non-recurring w/LMU)	A.6.1
2-WIRE ASYMMETRICAL DIGITAL SUBSCRIBER LINE (ADSL) COMPATIBLE LOOP	A.6
Universal Digital Channel - Disconnect Only	A.5.6
Universal Digital Channel	A.5.6
2-Wire ISDN Digital Grade Loop - Disconnect Only	A.5.1
2-Wire ISDN Digital Grade Loop	A.5.1

4-Wire Copper Loop - short	A.14.1
	A.14
2-Wire Copper Loop - long (Nonrecurring without LMU) - Disc. Only	A.13./woL
2-Wire Copper Loop - long (Nonrecurring without LMU)	A.13.7woL
2-Wire Copper Loop - long (Nonrecurring with LMU) - Disc. Only	A.13.7wL
	A.13.7wL
2-Wire Copper Loop - long	A.13.7
2-Wire Copper Loop - short (Nonrecurring without LMU) - Disc. Only	A.13.1woL
2-Wire Copper Loop - short (Nonrecurring without LMU)	A. 13.1woL
2-Wire Copper Loop - short (Nonrecurring with LMU) - Disc. Only	A. 13.1wL
2-Wire Copper Loop - short (Nonrecurring with LMU)	A.13.1wL
2-Wire Copper Loop - short	A.13.1
2-WIRE COPPER LOOP	A.13
Unbundled Loop Concentration - Digital 19, 56, 64 Kbps Data - Disconnect Only	A.12.11
Unbundled Loop Concentration - Digital 19, 56, 64 Kbps Data	A.12.11
Unbundled Loop Concentration - TEST CIRCUIT Card - Disconnect Only	A.12.10
Unbundled Loop Concentration - TEST CIRCUIT Card	A. 12.10
Unbundled Loop Concentration - Specials Card - Disconnect Only	A.12.9
Unbundled Loop Concentration - Specials Card	A.12.9
Unbundled Loop Concentration - SPOTS Card - Disconnect Only	A.12.
Unbundled Loop Concentration - SPOTS Card	A.12.8
Unbundled Loop Concentration - ISDN (Brite Card) - Disconnect Only	A.12.7
Unbundled Loop Concentration - ISDN (Brite Card)	A.12.7
Unbundled Loop Concentration - POTS Card - Disconnect Only	A.12.6
Unbundled Loop Concentration - POTS Card	A.12.6
Unbundled Sub-loop Concentration - USLC Feeder Interface - Disconnect Only	A.12.5
Unbundled Sub-loop Concentration - USLC Feeder Interface	A.12.5
Unbundled Loop Concentration - System B (TR303) - Disconnect Only	A.12.4
Unbundled Loop Concentration - System B (TR303)	A.12.4
Unbundled Loop Concentration - System A (TR303) - Disconnect Only	A.12.3
Unbundled Loop Concentration - System A (TR303)	A.12.3
Unbundled Loop Concentration - System B (TR008) - Disconnect Only	A.12.2
Unbundled Loop Concentration - System B (TR008)	A.12.2

modification - Load Coil / Equipment Removal - long - First and Additional	
	A.17.2
	A.17.1
LOOP CONDITIONING	A.17
Capacity Unbundled Local Loop - STS-1 - Per Mile	. 16
Capacity Unbundled Local Loop - STS-1 - Facility Termination - Disconnect Only	1
Capacity Unbundled Local Loop - STS-1 - Facility Termination	
- OC48 - Interface OC12 on OC48 - Disconnect Only	
Capacity Unbundled Local Loop - OC48 - Interface OC12 on OC48	
Unbundled Local Loop - OC48 - Per Mile	
- OC48 - Facility Termination - Disconnect Only	
- OC48 - Facility Termination	
7	A.16.8
- Disconnect Only	A.16.7
High Capacity Unbundled Local Loop - OC12 - Facility Termination	A.16.7
	A. 16.5
Capacity Unbundled Local Loop - OC3 - Facility Termination - Disconnect Only	A. 16.4
Capacity Unbundled Local Loop - OC3 - Facility Termination	A.16.4
	A.16.2
Termination - Disconnect Only	A.16.1
High Capacity Unbundled Local Loop - DS3 - Facility Termination	A.16.1
HIGH CAPACITY UNBUNDLED LOCAL LOOP	A.16
Unbundled Network Terminating Wire (NTW) per Pair	A.15.1
ONDONDED NETWORK TERMINATING WIRE (NTW)	į
ring without LMU) - Disc. Only	A. 14. /WOL
- long (Nonrecurring without LMU)	A.14./woL
Copper Loop - long (Nonrecurring with LMU) - Disc. Only	A.14.7wL
4-Wire Copper Loop - long (Nonrecurring with LMU)	A.14.7wL
	A.14.7
- Disc. Only	A.14.1woL
without LMU)	A.14.1woL
- Disc. Only	A.14.1wL
4-Wire Copper Loop - short (Nonrecurring with LMU)	A.14.1wL

A.17.3	
A.17.4	Loop Modification - Additive
A.17.5	W Copper Distribution Load Coil/Emin Demon Birth
A.17.6	cation - 2W/4W Copper Distrib. Bridged Tan Removal First/Add'l
A.18	rap welloval First/Add'I
A.18.1	Channelization - Channel System DS1 to DS0
A.18.1	Channelization - Channel System DS1 to DS0 - Disconnect Only
A.18.2	OCU-DP Card
A.18.3	Interface Unit - Interface DS1 to DS0 - BRITE Card
A.18.4	Frade Card
A.18.5	
A.18.5	Channelization - Channel System DS3 to DS1 - Disconnect Only
A.18.6	
A.19	LOOP TESTING BEYOND VOICE GRADE
A.19.1	Loop Testing Beyond VG - Basic per 1/2 hour
A.19.2	Loop Testing Beyond VG - Overtime per 1/2 hour
A.19.3	Loop Testing Beyond VG - Premium per 1/2 hour
₩.0	UNBUNDLED LOCAL EXCHANGE PORTS AND FEATURES
B. 1	EXCHANGE PORTS
B.1.1	Exchange Ports - 2-Wire Analog Line Port (Res., Bus., Centrex, Coin)
B.1.1	Centrex, Coin) - Disconnect C-1
	THE CHITY
	Exchange Ports - 4-Wire Analog Voice Grade Port - Disconnect Only
B.1.3	Exchange Ports - 2-Wire DID Port - Disconnect Only
B.1.4	Exchange Ports - DDITS Port
	Exchange Ports - DDITS Port - Disconnect Only
B.1.5	Exchange Ports - 2-Wire ISDN Port
B.1.5	Exchange Ports - 2-Wire ISDN Port - Disconnect Only
B.1.6	Exchange Ports - 4-Wire ISDN DS1 Port
B.1.6	Exchange Ports - 4-Wire ISDN DS1 Port - Disconnect Only

B.1.7	Tipo Doub (True)
B 1 7	TOTAL 2-WITE MIGIOG WITHE FOIT (FBX)
	The final of the force of the f
*	
B.4.10	Centrex Functionality
B.4.13	Features per port
c.0	UNBUNDLED SWITCHING AND LOCAL INTERCONNECTION
5	END OFFICE SWITCHING
C.1.1	End Office Switching Function, Per MOU
C.1.2	End Office Trunk Port - Shared, Per MOU
C.2	TANDEM SWITCHING
C.2.1	Tandem Switching Function Per MOU
C.2.2	Tandem Trunk Port - Shared, Per MOU
0.0	UNBUNDLED TRANSPORT AND LOCAL INTEROFFICE TRANSPORT
D.1	COMMON TRANSPORT
D.1.1	Common Transport - Per Mile, Per MOU
D.1.2	Common Transport - Facilities Termination Per MOU
	INTEROFFICE TRANSPORT - DEDICATED - VOICE GRADE
D.2.1	Interoffice Transport - Dedicated - 2-Wire Voice Grade - Per Mile
	Interoffice Transport - Dedicated - 2-Wire Voice Grade - Facility Termination
D.2.2	Interoffice Transport - Dedicated - 2-Wire Voice Grade - Facility Termination - Disconnect Only
Ð.3	INTEROFFICE TRANSPORT - DEDICATED - DS0 - 56/64 KBPS
D.3.1	Interoffice Transport - Dedicated - DSO - Per Mile
D.3.2	Interoffice Transport - Dedicated - DSO - Facility Termination
D.3.2	Interoffice Transport - Dedicated - DSO - Facility Termination - Disconnect Only
Ð.	INTEROFFICE TRANSPORT - DEDICATED - DS1
D.4.1	Interoffice Transport - Dedicated - DS1 - Per Mile
D.4.2	Interoffice Transport - Dedicated - DS1 - Facility Termination
D.4.2	Interoffice Transport - Dedicated - DS1 - Facility Termination - Disconnect Only
D. 5	LOCAL CHANNEL - DEDICATED
D.5.1	Jocal Channel - Dedicated - 2-Wire Voice Grade
D.5.1	Local Channel - Dedicated - 2-Wire Voice Grade - Disconnect Only
D.5.2	Local Channel - Dedicated - 4-Wire Voice Grade

INTEROFFICE TRANSPORT - DEDICATED - OC48	
Transport - Dedicated - OC12 - Facility Termination - Disconnect Only	0.8.2
Transport - Dedicated - OC12 - Facility Termination	0.8.2
Transport - Dedicated - OC12 - Per Mile	
TRANSPORT - DEDICATED - OC12	D. 8
- Dedicated - OC3 - Facility Termination - Disconnect Only	D.7.2
Interoffice Transport - Dedicated - OC3 - Facility Termination	D.7.2
Interoffice Transport - Dedicated - OC3 - Per Mile	D.7.1
	D.7
Interoffice Transport - Dedicated - DS3 - Facility Termination - Disconnect Only	D.6.2
Interoffice Transport - Dedicated - DS3 - Facility Termination	D.6.2
Interoffice Transport - Dedicated - DS3 - Per Mile	D.6.1
- DEDICATED - DS3	D. 6
Local Channel - Dedicated - DS1 - Disconnect Only	D.5.24
Local Channel - Dedicated - DS1	D.5.24
Local Channel - Dedicated - STS-1 - Per Mile	D.5.23
	D.5.21
Local Channel - Dedicated - STS-1 - Facility Termination	D.5.21
Local Channel - Dedicated - 0C48 - Interface OC12 on OC48 - Disconnect Only	D.5.19
Local Channel - Dedicated - OC48 - Interface OC12 on OC48	D.5.19
Local Channel - Dedicated - OC48 - Facility Termination - Disconnect Only	D.5.17
Local Channel - Dedicated - OC48 - Facility Termination	D.5.17
Local Channel - Dedicated - OC48 - Per Mile	D.5.16
Local Channel - Dedicated - OC12 - Facility Termination - Disconnect Only	D.5.14
Local Channel - Dedicated - OC12 - Facility Termination	D.5.14
Local Channel - Dedicated - OC12 - Per Mile	D.5.13
Local Channel - Dedicated - OC3 - Facility Termination - Disconnect Only	D.5.11
Local Channel - Dedicated - OC3 - Facility Termination	D.5.11
	D.5.10
Local Channel - Dedicated - DS3 - Facility Termination - Disconnect Only	0.5.8
Local Channel - Dedicated - DS3 - Facility Termination	D.5.8
	D.5.7
Local Channel - Dedicated - 4-Wire Voice Grade - Disconnect Only	D.5.2

CCS7 SIGNALING TRANSPORT	Ε.ω
Originating Point Code Establishment or Change - Disconnect Only	ü
Establishment or Change	2.3
LIDB Validation Per Query	
LIDB Common Transport Per Query	2.1
INFORMATION DATA BASE ACCESS (LIDB)	
Screening, w/ POTS No. Delivery	. 10
800 Access Ten Digit Screening, w/ 8FL No. Delivery	E.1.9
800 Access Ten Digit Screening, Call Handling and Destination Features	
800 Access Ten Digit Screening, Change Charge Per Request	E.1.7
800 Access Ten Digit Screening, Multiple InterLATA CXR Routing Per CXR Requested Per 800 No.	
Ten Digit Screening, Customized Area of Service Per 800 Number	1.5
800 Access Ten Digit Screening, Per 800 No. Established With POTS Translations - Disc. Only	E.1.4
800 Access Ten Digit Screening, Per 800 No. Established With POTS Translations	E.1.4
Access Ten Digit Screening, Per 800 No. Established W/O POTS Translations - Disc. Onl	E.1.3
Ten Digit Screening, Per 800 No. Established W/O POTS Translations	.1.3
800 Access Ten Digit Screening, Reservation Charge Per 800 Number Reserved	
800 Access Ten Digit Screening, Per Call	I
& SERVICE MANAGEMENT SYSTEMS	
Interoffice Transport - Dedicated - 4-Wire Voice Grade - Facility Termination - Disconnect Only	D.12.2
Interoffice Transport - Dedicated - 4-Wire Voice Grade - Facility Termination	
Interoffice Transport - Dedicated - 4-Wire Voice Grade - Per Mile	D.12.1
INTEROFFICE TRANSPORT - DEDICATED - 4-WIRE VOICE GRADE	D.12
Interoffice Transport - Dedicated - STS-1 - Facility Termination - Disconnect Only	D.10.2
Interoffice Transport - Dedicated - STS-1 - Facility Termination	D.10.2
Interoffice Transport - Dedicated - STS-1 - Per Mile	D.10.1
INTEROFFICE TRANSPORT - DEDICATED - STS-1	D.10
Interoffice Transport - Dedicated - OC48 - Interface OC12 on OC48 - Disconnect Only	D.9.4
Interoffice Transport - Dedicated - OC48 - Interface OC12 on OC48	D.9.4
Interoffice Transport - Dedicated - OC48 - Facility Termination - Disconnect Only	D.9.2
Interoffice Transport - Dedicated - OC48 - Facility Termination	D.9.2
Interoffice Transport - Dedicated - OC48 - Per Mile	D.9.1

LNP QUERY SERVICE	E.6
BellSouth E911 Access - Interoffice Transport - Dedicated - DS1 Per Facility Termination - Disc. Only (same as D.4.2)	
BellSouth E911 Access - Interoffice Transport - Dedicated - DS1 Per Facility Termination (Same as D.4.2)	E. 5. 6
BellSouth E911 Access - Interoffice Transport - Dedicated - DS1 Per Mile (Same as D.4.1)	
BellSouth E911 Access - Local Channel - Dedicated - DS1 (Same as D.5.24) - Disconnect Only	
BellSouth E911 Access - Local Channel - Dedicated - DS1 (Same as D.5.24)	E.5.4
- Interoffice Transport - Dedicated 2-wire Voice Grade Per Fac. Term- Disc.	
BellSouth E911 Access - Interoffice Transport - Dedicated 2-wire Voice Grade Per Fac. Term (same as D.2.2)	
- Interoffice Transport - Dedicated - 2-wire Voice Grade Per Mile (Same a	
BellSouth E911 Access - Local Channel - Dedicated - 2-wire Voice Grade (Same as D.5.1) - Disc. Only	
BellSouth E911 Access - Local Channel - Dedicated - 2-wire Voice Grade (Same as D.5.1)	E.5.1
BELLSOUTH ACCESS TO E911 SERVICE	E.5
CNAM for DB and Non DB Owners, Per Query	E.4.5
CNAM for Non DB Owners Service Provisioning with Point Code Establishment - Disc. Only	
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Nonrec. Cost - 4-wire DS1 Digital Extd. Loop with De D.6.1 Interoffice Transport - Dedicated - DS3 - Per Additional DS1 in same DS3 P.17.16 Nonrecurring Cost - New Feature Activation f 4-Wire DS1 Digital Loop with DDITS Port - switch-as- 4-wire DS1 Digital Loop with DDITS Trunk Port Combinati. 4-wire DS1 Digital Loop / DDITS Trunk Port Combinati. 5 4-Wire DS1 Dig. Loop / DDITS Trunk Port CombSubsective Loop / 2 wire voice Grade in Transport / 2 wire prize Loop / 2 wire voice Grade in Transport / 2 w vg per 1 Fixed - Switch-as-is D.2.1 Interoffice Transport - Dedicated - 2 w vg per Nonrecurring Cost for Extended Loop or Local Channel Nonrecurring Cost for Extended Loop or Local Channel Nonrecurring Cost - New DS1 Interoffice Facility for Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 Nonrecurring Cost - New DS3 or STS-1 Interoffice Facility	-	Cost - 4-wire DS1 Digital Extd. Loop with De
Additional DS1 in same DS3 P.17.16 Nonrecurring Cost - New Feature Activation f 4-Wire DS1 Digital Loop WITH DDITS PORT 4-Wire DS1 Digital Loop with DDITS Port - switch-as- 3 4-Wire DS1 Digital Loop / DDITS Trunk Port Combinati. 5 4-Wire DS1 Dig. Loop / DDITS Trunk Port CombSubsec 2-WIRE LOOP/ 2 WIRE VOICE GRADE IO TRANSPORT/ 2 WIRE 1 Fixed - Switch-as-is 2 D.2.1 Interoffice Transport - Dedicated - 2 W Vg per 3 2W VG Loop / 2W VG IO Transport / 2W Port Combination Nonrecurring Cost for Extended Loop or Local Channel 1 Nonrec. Cost for Extended Loop or Local Channel 2 Nonrecurring Cost - New DS1 Interoffice Facility for Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 Nonrec. Cost - New DS1 Interoffice Facility w/ 1 Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 Nonrecurring Cost - New DS3 or STS-1 Interoffice Facility		Cost - 4-wire DS1 Digital Extd. Loop with De
P.17.16 Nonrecurring Cost - New Feature Activation f 4-WIRE DS1 DIGITAL LOOP WITH DDITS PORT 4-Wire DS1 Digital Loop with DDITS Port - switch-as- 4-Wire DS1 Digital Loop / DDITS Trunk Port Combinati 5 4-Wire DS1 Dig. Loop / DDITS Trunk Port Combinati 5 4-Wire DS1 Dig. Loop / DDITS Trunk Port Combinati 6 2-WIRE LOOP/ 2 WIRE VOICE GRADE IO TRANSPORT/ 2 WIRE 1 Fixed - Switch-as-is 2 D.2.1 Interoffice Transport - Dedicated - 2 W VG per 2 D.2.1 Interoffice Transport / 2W Port Combination Nonrecurring Cost for Extended Loop or Local Channel 1 Nonrecurring Cost for Extended Loop or Local Channel 1 Nonrecurring Cost - New DS1 Interoffice Facility for Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 1 Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 1 Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 1 Nonrecurring Cost - New DS1 Interoffice Facility w/ 1		Transport - Dedicated - DS3 - Per
P.17.16 Nonrecurring Cost - New Feature Activation f 4-Wire DS1 Digital Loop With DDITS PORT 4-Wire DS1 Digital Loop with DDITS Port - switch-as- 4-Wire DS1 Digital Loop / DDITS Trunk Port Combinati. 5 4-Wire DS1 Dig. Loop / DDITS Trunk Port CombSubse. 2-WIRE LOOP / WIRE VOICE GRADE IO TRANSPORT/ 2 WIRE 1 Fixed - Switch-as-is D.2.1 Interoffice Transport - Dedicated - 2 W VG per Nonrecurring Cost for Extended Loop or Local Channel Nonrecurring Cost for Extended Loop or Local Channel Nonrec. Cost for Extended Loop or Local Channel Nonrecurring Cost - New DS1 Interoffice Facility for Nonrecurring Cost - New DS1 Interoffice Facility w/ 1. Nonrec. Cost - New DS1 Interoffice Facility w/ 1. Nonrecurring Cost - New DS1 Interoffice Facility w/ 1. Nonrecurring Cost - New DS3 or STS-1 Interoffice Facility		in same DS3
4-WIRE DS1 DIGITAL LOOP WITH DDITS PORT 4-Wire DS1 Digital Loop with DDITS Port - switch-as- 3 4-wire DS1 Digital Loop / DDITS Trunk Port Combinati. 5 4-Wire DS1 Dig. Loop / DDITS Trunk Port CombSubsec. 2-WIRE LOOP/ 2 WIRE VOICE GRADE IO TRANSPORT/ 2 WIRE 1 Fixed - Switch-as-is 2 D.2.1 Interoffice Transport - Dedicated - 2 W Vg per 3 2W VG Loop / 2W VG IO Transport / 2W Port Combination Nonrecurring Cost for Extended Loop or Local Channel 1 Nonrecurring Cost for Extended Loop or Local Channel 2 Nonrecurring Cost - New DS1 Interoffice Facility for Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 Nonrec. Cost - New DS1 Interoffice Facility w/ 1 Nonrec. Cost - New DS1 Interoffice Facility w/ 1 Nonrec. Cost - New DS1 Interoffice Facility w/ 1/0 MU Nonrecurring Cost - New DS3 or STS-1 Interoffice Facility		Nonrecurring Cost - New Feature Activation f
4-Wire DS1 Digital Loop with DDITS Port - switch-as- 3 4-wire DS1 Digital Loop / DDITS Trunk Port Combinati 5 4-Wire DS1 Dig. Loop / DDITS Trunk Port Comb Subsec 2-WIRE LOOP / 2 WIRE VOICE GRADE IO TRANSPORT / 2 WIRE 1 Fixed - Switch-as-is 2 D.2.1 Interoffice Transport - Dedicated - 2 W VG per 3 2W VG Loop / 2W VG IO Transport / 2W Port Combination Nonrecurring Cost for Extended Loop or Local Channel 1 Nonrecurring Cost for Extended Loop or Local Channel 2 Nonrecurring Cost - New DS1 Interoffice Facility for 3 Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 3 Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 4 Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 5 Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 6 Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 6 Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 6 Nonrecurring Cost - New DS3 or STS-1 Interoffice Facility		DS1 DIGITAL LOOP WITH DDITS PORT
3 4-wire DS1 Digital Loop / DDITS Trunk Port Combinati 5 4-Wire DS1 Dig. Loop / DDITS Trunk Port CombSubsec 2-WIRE LOOP / WIRE VOICE GRADE IO TRANSPORT/ 2 WIRE 1 Fixed - Switch-as-is 2 D.2.1 Interoffice Transport - Dedicated - 2 W VG per 3 2W VG Loop / 2W VG IO Transport / 2W Port Combination Nonrecurring Cost for Extended Loop or Local Channel 1 Nonrec. Cost for Extended Loop or Local Channel 2 Nonrecurring Cost - New DS1 Interoffice Facility for Nonrecurring Cost - New DS1 Interoffice Facility W/ 1 2 Nonrec. Cost - New DS1 Interoffice Facility W/ 1 3 Nonrec. Cost - New DS1 Interoffice Facility W/ 1 4 Nonrec. Cost - New DS1 Interoffice Facility W/ 1 5 Nonrec. Cost - New DS1 Interoffice Facility W/ 1 6 Nonrecurring Cost - New DS1 Interoffice Facility W/ 1 6 Nonrecurring Cost - New DS1 Interoffice Facility W/ 1		DS1 Digital Loop with DDITS Port - switch-as-
5 4-Wire DS1 Dig. Loop / DDITS Trunk Port CombSubset 2-WIRE LOOP/ 2 WIRE VOICE GRADE IO TRANSPORT/ 2 WIRE 1 Fixed - Switch-as-is 2 D.2.1 Interoffice Transport - Dedicated - 2 W Vg per 2 D.2.1 Interoffice Transport / 2W Port Combination Nonrecurring Cost for Extended Loop or Local Channel 1 Nonrecurring Cost for Extended Loop or Local Channel 2 Nonrecurring Cost - New DS1 Interoffice Facility for 3 Nonrecurring Cost - New DS1 Interoffice Facility W/ 1 3 Nonrecurring Cost - New DS1 Interoffice Facility W/ 1 4 Nonrecurring Cost - New DS1 Interoffice Facility W/ 1 5 Nonrecurring Cost - New DS1 Interoffice Facility W/ 1 6 Nonrecurring Cost - New DS1 Interoffice Facility W/ 1 7 Nonrecurring Cost - New DS1 Interoffice Facility W/ 1 8 Nonrecurring Cost - New DS1 Interoffice Facility W/ 1 8 Nonrecurring Cost - New DS3 or STS-1 Interoffice Facility	ω	DS1 Digital Loop / DDITS Trunk Port Combinati
2-WIRE LOOP/ 2 WIRE VOICE GRADE IO TRANSPORT/ 2 WIRE 1 Fixed - Switch-as-is 2 D.2.1 Interoffice Transport - Dedicated - 2 W VG per 3 2W VG Loop / 2W VG IO Transport / 2W Port Combination Nonrecurring Cost for Extended Loop or Local Channel 1 Nonrecurring Cost for Extended Loop or Local Channel 2 Nonrecurring Cost - New DS1 Interoffice Facility for Nonrecurring Cost - New DS1 Interoffice Facility W/ 1 3 Nonrecurring Cost - New DS1 Interoffice Facility W/ 1 3 Nonrecurring Cost - New DS1 Interoffice Facility W/ 1 3 Nonrecurring Cost - New DS1 Interoffice Facility W/ 1 4 Nonrecurring Cost - New DS1 Interoffice Facility W/ 1	-5	DS1 Dig. Loop / DDITS Trunk Port CombSubse
1 Frixed - Switch-as-is 2 D.2.1 Interoffice Transport - Dedicated - 2 W Vg per 3 2W Vg Loop / 2W Vg IO Transport / 2W Port Combination Nonrecurring Cost for Extended Loop or Local Channel 1 Nonrec. Cost for Extended Loop or Local Channel of Nonrecurring Cost - New DS1 Interoffice Facility for Nonrecurring Cost - New DS1 Interoffice Facility for Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 Nonrec. Cost - New DS1 Interoffice Facility w/ 1 Nonrec. Cost - New DS1 Interoffice Facility w/ 1/0 MU Nonrecurring Cost - New DS3 or STS-1 Interoffice Facility w/ 1/0 MU		LOOP/ 2 WIRE VOICE GRADE IO TRANSPORT/ 2 WIRE
D.2.1 Interoffice Transport - Dedicated - 2 W VG per 2 D.2.1 Interoffice Transport - Dedicated - 2 W VG per 3 2W VG Loop / 2W VG IO Transport / 2W Port Combination Nonrecurring Cost for Extended Loop or Local Channel Nonrec. Cost for Extended Loop or Local Channel and I Nonrecurring Cost - New DS1 Interoffice Facility for Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 Nonrec. Cost - New DS1 Interoffice Facility w/ 1 Nonrec. Cost - New DS1 Interoffice Facility w/ 1 Nonrec. Cost - New DS1 Interoffice Facility w/ 1/0 MU Nonrecurring Cost - New DS3 or STS-1 Interoffice Facility		- Switch-as-is
Nonrecurring Cost for Extended Loop or Local Channel Nonrecurring Cost for Extended Loop or Local Channel Nonrecurring Cost for Extended Loop or Local Channel Nonrec. Cost for Extended Loop or Local Channel and I Nonrecurring Cost - New DS1 Interoffice Facility for Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 Nonrec. Cost - New DS1 Interoffice Facility w/ 1 Nonrec. Cost - New DS1 Interoffice Facility w/ 1 Nonrec. Cost - New DS1 Interoffice Facility w/ 1/0 MC1	2	- Dedicated - 2 W VG per
Nonrecurring Cost for Extended Loop or Local Channel Nonrecurring Cost for Extended Loop or Local Channel Nonrecurring Cost for Extended Loop or Local Channel Nonrecurring Cost - New DS1 Interoffice Facility for Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 Nonrec. Cost - New DS1 Interoffice Facility w/ 1/0 MU Nonrecurring Cost - New DS3 or STS-1 Interoffice Facility	i.	2W VG IO Transport / 2W Port Combination
Nonrecurring Cost for Extended Loop or Local Channel Nonrec. Cost for Extended Loop or Local Channel and I Nonrecurring Cost - New DS1 Interoffice Facility for Nonrecurring Cost - New DS1 Interoffice Facility for Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 Nonrec. Cost - New DS1 Interoffice Facility w/ 1 Nonrec. Cost - New DS1 Interoffice Facility w/ 1/0 MU Nonrecurring Cost - New DS3 or STS-1 Interoffice Facility		or Local Channel
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Nonrecurring Cost - New DS1 Interoffice Facility w/ 1 Nonrec. Cost - New DS1 Interoffice Facility w/ 1/0 MU Nonrecurring Cost - New DS3 or STS-1 Interoffice Facility		Cost - New DS1 Interoffice Facility for
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Nonrecurring Cost - New DS3 or STS-1 Interoffice Faci		w DS1 Interoffice Facility w/ 1/0 MU
CIT CON CALLY		 New DS3 or STS-1 Interoffice Faci.

				P.51-3 Additional 2-Wire	D.4.1	Nonrec. Cost -	Nonrec. Cost - 2	P.17.1 Nonrec. C	P.17.1 Nonrec. C	P.51-1 First 2-Wire ISDN	P.51 2-WIRE ISDN EXTENDED LOOP	P.50.5 4-Wire DS1 Loop/	4-Wire DS1	4-Wire DS1	P50ISDN2 Additional ISDN in	P50ISDN-1 First ISDN in DS1	P50DID2 Additional 2-Wil	P.50 DID1 First 2-Wire DI	P.50.VG2 Additional Voice	P.50.VG1 First Voice Grade in DS1	P.50 4-WIRE DS1 LOOP	A.16.16 High Ca	P.26-3 Per Mile - Loop	P.26-2 D.10.1 Interoffice	Nonrec. Cost -	Nonrec. Cost -	P.17.1 Nonrec. Cost	P.17.1 Nonrec.	P.26-1 Fixed	P.26 STS1 DIGITAL E	P.25-3 A.16.2 High Ca	
EXTENDED LOOP WITH DEDICATED STS-1 INTEROFFICE TRANSPORT	EXTENDED LOOP WITH DEDICATES CELL	ATUN ASA OUTA	- New Feature Activation for Combination Has an		, Disc. Only	DS1 Interoffice Transport - NEW - Disc Only	- SWITCH-as-is -Dis	for Extd. Loop or Local Channel and Interoffice Comb Switch-as-is		in DS1	WITH DS1 INTEROFFICE TRANSPORT	- Subsequent Activity Add manning - Fer Line	ctivity - Add Linca -18		same DS1	- Switch-as-is		DID in DS1 -Switch-as-is	Grade in same DS1	- Switch-as-is	ORT	High Capacity Unbundled Local Loop - STS-1 - Per Mile		Transport - Dedicated - STS-1 - Per Mile	STS1 Digital Extd. Loop with Ded. STS1 Interoffice Transport	STS1 Digital Extd. Loop with Ded. STS1 Interoffice Transport	for Extd. Loop or Local Channel and Interoffice Comb	Cost for Extd. Loop or Local Channel and Interoffice Cont		STS1 INTEROFFICE TRANSPORT	A.16.2 High Capacity Unbundled Local Loop - DS3 - Per Mile	

-		₽.55-1	P.55	P.54-4	P.54-3	P.54-2				P.54-1	F . 54		P.53-4		P.53-3	P.53-2					P.53-1	₽.53		P.52-3	P.52-2			
1 Mux- 1	Cost for Extd. Loop or Local Channel and Interoffice Comb Switch-as-is re	TANKANDO NY SYL MUX	KBPS EXTD DIGITAL LOOP WITH DED. DS1 INTEROFFICE TRANS w/ 2/1	ATWO ASH OFFI		remise with 3/1 Mux - NEW - D	Ded. DS1 Interoffice Trans with 3/1 Mux - NEW	1. DS1 Interoffice Trans with 2/2	and Interoffice Comb G SWITCh-as	· · · · · · · · · · · · · · · · · · ·	4/ 3/1 MITY	Feature Activation for Combination Use Only		P.17.16 Nonrec. Cost - New Feature Activation for Combination Use Cmlv		- Per Mile	DS1 Interoffice Trans with 3/1 Mux- NEW	Commo - SWITCh-as-is-	Channel and Interoffice Comb Gardin	P.17.1 Nonrec. Cost for Extd. Loop of Local Channel and Interoffice Combined.		RT W/ 3/1 MTV	6 Nonrec. Cost - New Feature Activation for Combination Use Omiv		- STS-1 - Per Mile	STS-1 Interoffice Transport - NEW	Comb Switch-as-is	

ire 56 or 64 Kbps Dig. Extd Loop w/ Ded DS0 Interoffice Trans - NEW- Disc	
Cost- 4-Wire 56 or 64 Kbps Dig. Extd Loop w/ Ded DSO Interoffice Tra	
Comb Switch-as-is	
1	
	P.58-1
ANSPORT	
P.17.16 Nonrec. Cost - New Feature Activation for Combination Use Only	
	P.57-3
roffice Transport - Dedicated - DS1 - Per Mile	
ire DS1 Dig Extd. Loop with Ded DS1 Interoffice Trans. w/ 3/1 Myv. Now T	
ST-SP-TT-420	
Interoffice Comb - Switch as in	
	P.57-1
ORT W/ 3/1/ MITY	₽.57
P.17.16 Nonrec. Cost - New Feature Activation for Combination Use Only	
Cash Z	P.56-4
P.17.16 Nonrec. Cost - New Feature Activation for Combination Use Only	
	P.56-3
l - Per Mile	P.56-2
31 Interoffice Trans w/ 3/1 Min. Average of the state of	
Interoffice Transport with 2/1 ac-	
and Interoffice Comb - Switch-as-1	
T English	P.56-1
E TRANSPORT W/ 3/1WIIX	ъ.56
P.17.16 Nonrec. Cost - New Feature Activation for Combination Use Only	
CILLY	P.55-4
51	P.55-3
Per Mile	P.55-2

Q.0	D4 CHANNEL BANKS
Q.1	D4 CHANNEL BANKS CENTRAL OFFICE
Q.1.1	D4 Channel Bank Inside CO - System
2.1.3	Unbundled Loop Concentration - ISDN (Brite Card)
2.1.4	Unbundled Loop Concentration - POTS Card